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Attorney for Plaintiff

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

LATOYA DEANN JOHNSON,)	
Plaintiff,)	Civil No. 4:12-cv-05291-DMR
)	
v.)	STIPULATION AND PROPOSED ORDER
)	TO EXTEND TIME
MICHAEL J. ASTRUE,)	
Commissioner of Social Security,)	
Defendant.)	

IT IS HEREBY STIPULATED by and between the parties, through their respective counsel of record, that the time for Plaintiff to file her Motion for Summary Judgment be extended from April 2, 2013 to May 2, 2013. This is Plaintiff's second request for an extension of time to file her Motion for Summary Judgment. Plaintiff needs the additional time to further review the documents submitted by Defendant and to prepare the Motion in this matter due to a heavy workload, despite due diligence. Counsel apologizes to the Court for any inconvenience caused by this delay.

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Stipulation and Proposed Order to Extend Time – 4:12-cv-05291-DMR

Respectfully submitted,

Dated: March 27, 2013

/s/ Ron S. Hochbaum
RON S. HOCHBAUM
Attorney for Plaintiff

Dated: March 27, 2013

MELINDA L. HAAG
United States Attorney

/s/ Paul Sachelari
PAUL SACHELARI
Special Assistant United States Attorney

Attorneys for Defendant

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated:



DONNA M. RYU
UNITED STATES MAGISTRATE JUDGE